

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,

Plaintiff,

v.

Case No. 1:19-cv-00010-JTN-SJB

THE AMERICAN INSURANCE COMPANY, et. al,

Honorable Janet T. Neff

Mag. Judge Sally J. Berens

Defendants.

Special Master Paula Manderfield

DEFENDANTS' NOTICE OF VIDEO DEPOSITION OF BOB DEBUSSCHERE

TO: All Counsel of Record

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Civil Procedure 26 and 30, Defendants¹ will take the deposition upon oral examination of Bob DeBusschere before a notary public or other officer duly authorized to administer oaths, which deposition will be recorded by stenographic and video means. All parties are welcome to attend and ask questions.

The deposition will take place beginning at 1:00 PM Eastern on Tuesday, August 15, 2023, and continuing thereafter until completed, via web-based video conferencing software (Zoom or its equivalent). This deposition will be limited to the witness's knowledge of the events identified in Wolverine World Wide, Inc.'s response to Interrogatory Number 2 of

¹ "Defendants" as used herein, collectively or separately, means Defendants First State Insurance Company, The North River Insurance Company, SPARTA Insurance Company, as successor in interest for certain limited purposes to American Employers' Insurance Company, and The Travelers Indemnity Company, as well as Counter-Claimants The Travelers Indemnity Company of Illinois n/k/a Travelers Property Casualty Company of America, Northfield Insurance Company, St. Paul Fire and Marine Insurance Company, The Aetna Casualty and Surety Company n/k/a Travelers Casualty and Surety Company and Travelers Property Casualty Company of America.

Wolverine's Objections and Responses to Defendants' Third Set of Phase II Interrogatories and Wolverine's April 26, 2023 Supplemental Phase II Initial Disclosure Statement. Defendants reserve the right to record the testimony by audio or video technology, including videotape and cloud-based technology. Please take notice that the court reporter may conduct the deposition from a remote location as if the reporter were physically present in the room with the deponent.

Respectfully submitted,

s/Patrick E. Winters

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Patrick E. Winters
Drew L. Block
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Attorneys for Defendant/Counter-Claimant The Travelers Indemnity Company and Counter-Claimants The Travelers Indemnity Company of Illinois n/k/a Travelers Property Casualty Company of America, Northfield Insurance Company, St. Paul Fire and Marine Insurance Company, The Aetna Casualty and Surety Company n/k/a Travelers Casualty and Surety Company and Travelers Property Casualty Company of America

s/Anthony F. Caffrey, III

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s/Seth M. Jaffe

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***Attorneys for Defendant First State
Insurance Company***

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,

Plaintiff,

v.

Case No. 1:19-cv-00010-JTN-SJB

THE AMERICAN INSURANCE COMPANY, et. al,

Honorable Janet T. Neff

Mag. Judge Sally J. Berens

Defendants.

Special Master Paula Manderfield

CERTIFICATE OF SERVICE

I do hereby certify that on the 10th day of July, 2023, I served the foregoing *Defendants'* *Notice of Video Deposition of Bob DeBusschere* to all counsel of record via email and filed this certificate of service with the Clerk of the Court using the electronic court filing system, which will send notification of such filing to all counsel of record.

s/Patrick E. Winters

Patrick E. Winters P62794

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,

Plaintiff,

v.

Case No. 1:19-cv-00010-JTN-SJB

THE AMERICAN INSURANCE COMPANY, et. al,

Honorable Janet T. Neff

Mag. Judge Sally J. Berens

Defendants.

Special Master Paula Manderfield

DEFENDANTS' NOTICE OF VIDEO DEPOSITION OF GUY HAYDEN

TO: All Counsel of Record

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Civil Procedure 26 and 30, Defendants¹ will take the deposition upon oral examination of Guy Hayden before a notary public or other officer duly authorized to administer oaths, which deposition will be recorded by stenographic and video means. All parties are welcome to attend and ask questions.

The deposition will take place beginning at 9:30 AM Eastern on Tuesday, August 15, 2023, and continuing thereafter until completed, via web-based video conferencing software (Zoom or its equivalent). This deposition will be limited to the witness's knowledge of the events identified in Wolverine World Wide, Inc.'s response to Interrogatory Number 2 of

¹ "Defendants" as used herein, collectively or separately, means Defendants First State Insurance Company, The North River Insurance Company, SPARTA Insurance Company, as successor in interest for certain limited purposes to American Employers' Insurance Company, and The Travelers Indemnity Company, as well as Counter-Claimants The Travelers Indemnity Company of Illinois n/k/a Travelers Property Casualty Company of America, Northfield Insurance Company, St. Paul Fire and Marine Insurance Company, The Aetna Casualty and Surety Company n/k/a Travelers Casualty and Surety Company and Travelers Property Casualty Company of America.

Wolverine's Objections and Responses to Defendants' Third Set of Phase II Interrogatories and Wolverine's April 26, 2023 Supplemental Phase II Initial Disclosure Statement. Defendants reserve the right to record the testimony by audio or video technology, including videotape and cloud-based technology. Please take notice that the court reporter may conduct the deposition from a remote location as if the reporter were physically present in the room with the deponent.

Respectfully submitted,

s/Patrick E. Winters

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s/Anthony F. Caffrey, III

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s/Seth M. Jaffe

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***Attorneys for Defendant First State
Insurance Company***

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,

Plaintiff,

v.

Case No. 1:19-cv-00010-JTN-SJB

THE AMERICAN INSURANCE COMPANY, et. al,

Honorable Janet T. Neff

Mag. Judge Sally J. Berens

Defendants.

Special Master Paula Manderfield

CERTIFICATE OF SERVICE

I do hereby certify that on the 10th day of July, 2023, I served the foregoing *Defendants'* *Notice of Video Deposition of Guy Hayden* to all counsel of record via email and filed this certificate of service with the Clerk of the Court using the electronic court filing system, which will send notification of such filing to all counsel of record.

s/Patrick E. Winters

Patrick E. Winters P62794

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,

Plaintiff,

v.

Case No. 1:19-cv-00010-JTN-SJB

THE AMERICAN INSURANCE COMPANY, et. al,

Honorable Janet T. Neff

Mag. Judge Sally J. Berens

Defendants.

Special Master Paula Manderfield

DEFENDANTS' NOTICE OF VIDEO DEPOSITION OF DAVID HUEY

TO: All Counsel of Record

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Civil Procedure 26 and 30, Defendants¹ will take the deposition upon oral examination of David Huey before a notary public or other officer duly authorized to administer oaths, which deposition will be recorded by stenographic and video means. All parties are welcome to attend and ask questions.

The deposition will take place beginning at 1:00 PM Eastern on Monday, August 14, 2023, and continuing thereafter until completed, via web-based video conferencing software (Zoom or its equivalent). This deposition will be limited to the witness's knowledge of the events identified in Wolverine World Wide, Inc.'s response to Interrogatory Number 2 of

¹ "Defendants" as used herein, collectively or separately, means Defendants First State Insurance Company, The North River Insurance Company, SPARTA Insurance Company, as successor in interest for certain limited purposes to American Employers' Insurance Company, and The Travelers Indemnity Company, as well as Counter-Claimants The Travelers Indemnity Company of Illinois n/k/a Travelers Property Casualty Company of America, Northfield Insurance Company, St. Paul Fire and Marine Insurance Company, The Aetna Casualty and Surety Company n/k/a Travelers Casualty and Surety Company and Travelers Property Casualty Company of America.

Wolverine's Objections and Responses to Defendants' Third Set of Phase II Interrogatories and Wolverine's April 26, 2023 Supplemental Phase II Initial Disclosure Statement. Defendants reserve the right to record the testimony by audio or video technology, including videotape and cloud-based technology. Please take notice that the court reporter may conduct the deposition from a remote location as if the reporter were physically present in the room with the deponent.

Respectfully submitted,

s/Patrick E. Winters

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s/Anthony F. Caffrey, III

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s/Seth M. Jaffe

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***Attorneys for Defendant First State
Insurance Company***

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,

Plaintiff,

v.

Case No. 1:19-cv-00010-JTN-SJB

THE AMERICAN INSURANCE COMPANY, et. al,

Honorable Janet T. Neff

Mag. Judge Sally J. Berens

Defendants.

Special Master Paula Manderfield

CERTIFICATE OF SERVICE

I do hereby certify that on the 10th day of July, 2023, I served the foregoing *Defendants'* *Notice of Video Deposition of David Huey* to all counsel of record via email and filed this certificate of service with the Clerk of the Court using the electronic court filing system, which will send notification of such filing to all counsel of record.

s/Patrick E. Winters

Patrick E. Winters P62794

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:19-CV-00010
)	
THE AMERICAN INSURANCE COMPANY,)	Honorable Janet T. Neff
et al.,)	Mag. Judge Sally J. Berens
)	Special Master Paula J. Manderfield
Defendants.)	

DEFENDANTS' NOTICE OF VIDEO DEPOSITION OF FRANK METSAARS

TO: All Counsel of Record

Please take notice that, pursuant to Federal Rules of Civil Procedure 26 and 30, Defendants¹ will take the deposition upon oral examination of Frank Metsaars before a notary public or officer duly authorized to administer oaths, which deposition will be recorded by stenographic and video means. The deposition shall commence on August 29, 2023, at 10:00 a.m. ET, and shall continue day to day until completed, via web-based video conferencing software (Zoom or equivalent). This deposition will be limited to the witness's knowledge of the events identified in Wolverine World Wide, Inc.'s response to Interrogatory Number 2 of

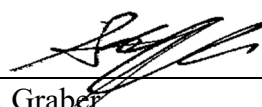
¹ "Defendants" as used herein, collectively or separately, means Defendants First State Insurance Company, The North River Insurance Company, SPARTA Insurance Company, as successor in interest for certain limited purposes to American Employers' Insurance Company, and The Travelers Indemnity Company, as well as Counter-Claimants The Travelers Indemnity Company of Illinois n/k/a Travelers Property Casualty Company of America, Northfield Insurance Company, St. Paul Fire and Marine Insurance Company, The Aetna Casualty and Surety Company n/k/a Travelers Casualty and Surety Company and Travelers Property Casualty Company of America

Wolverine's Objections and Responses to Defendants' Third Set of Phase II Interrogatories and Wolverine's April 26, 2023 Supplemental Phase II Initial Disclosure Statement. Defendants reserve the right to record the testimony by audio or video technology, including videotape and cloud-based technology. Please take notice that the court reporter may conduct the deposition from a remote location as if the reporter were physically present in the room with the deponent.

Dated: July 17, 2023

Respectfully submitted,

By: _____


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Attorneys for Defendants North River Insurance Company and SPARTA Insurance Company, as successor in interest for certain limited purposes to American Employers' Insurance Company

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

WOLVERINE WORLD WIDE, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:19-CV-00010
)	
THE AMERICAN INSURANCE COMPANY,)	Honorable Janet T. Neff
et al.,)	Mag. Judge Sally J. Berens
)	Special Master Paula J. Manderfield
Defendants.)	

CERTIFICATE OF SERVICE

Pursuant to LCivR 5.2, the undersigned attorney hereby certifies that on **July 17, 2023**, a copy of **Defendants' Notice of Deposition of Frank Metsaars** was caused to be served upon all counsel of record as shown in the attached service list via electronic mail, by agreement of all parties, and that this certificate of service was filed with the Clerk of Court using the electronic court filing system, which will send notification of such filing to all counsel of record.

Dated: July 17, 2023

Respectfully submitted,

By: /s/ Seth M. Jaffe
Brent J. Graber
Seth M. Jaffe
Hinkhouse Williams Walsh LLP
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*Attorneys for Defendants North River Insurance
Company and SPARTA Insurance Company, as
successor in interest for certain limited purposes to
American Employers' Insurance Company*

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,

Plaintiff,

v.

Case No. 1:19-cv-00010-JTN-SJB

THE AMERICAN INSURANCE COMPANY, et. al,

Honorable Janet T. Neff

Mag. Judge Sally J. Berens

Defendants.

Special Master Paula Manderfield

DEFENDANTS' NOTICE OF VIDEO DEPOSITION OF GREGORY MILLS

TO: All Counsel of Record

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Civil Procedure 26 and 30, Defendants¹ will take the deposition upon oral examination of Gregory Mills before a notary public or other officer duly authorized to administer oaths, which deposition will be recorded by stenographic and video means. All parties are welcome to attend and ask questions.

The deposition will take place beginning at 1:00 PM Eastern (12:00 PM Central) on Wednesday, August 30, 2023, and continuing thereafter until completed, via web-based video conferencing software (Zoom or its equivalent). This deposition will be limited to the witness's knowledge of the events identified in Wolverine World Wide, Inc.'s response to

¹ "Defendants" as used herein, collectively or separately, means Defendants First State Insurance Company, The North River Insurance Company, and The Travelers Indemnity Company, as well as Counter-Claimants The Travelers Indemnity Company of Illinois n/k/a Travelers Property Casualty Company of America, Northfield Insurance Company, St. Paul Fire and Marine Insurance Company, The Aetna Casualty and Surety Company n/k/a Travelers Casualty and Surety Company and Travelers Property Casualty Company of America.

Interrogatory Number 2 of Wolverine's Objections and Responses to Defendants' Third Set of Phase II Interrogatories and Wolverine's April 26, 2023 Supplemental Phase II Initial Disclosure Statement. Defendants reserve the right to record the testimony by audio or video technology, including videotape and cloud-based technology. Please take notice that the court reporter may conduct the deposition from a remote location as if the reporter were physically present in the room with the deponent.

Respectfully submitted,

/s/Patrick E. Winters

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Patrick E. Winters
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Attorneys for Defendant/Counter-Claimant The Travelers Indemnity Company and Counter-Claimants The Travelers Indemnity Company of Illinois n/k/a Travelers Property Casualty Company of America, Northfield Insurance Company, St. Paul Fire and Marine Insurance Company, The Aetna Casualty and Surety Company n/k/a Travelers Casualty and Surety Company and Travelers Property Casualty Company of America

/s/Seth M. Jaffe

Brent Graber
Seth M. Jaffe
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/s/ Anthony F. Caffrey, III

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s/Howard J. Fishman

Wayne S. Karbal

Howard J. Fishman

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***Attorneys for Defendant First State
Insurance Company***

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:19-cv-00010-JTN-ESC
)	
)	Honorable Janet T. Neff
THE AMERICAN INSURANCE COMPANY,)	
et. al,)	Mag. Judge Ellen S. Carmody
)	Special Master Paula Manderfield
Defendants.)	

CERTIFICATE OF SERVICE

I, Howard J. Fishman, an attorney, certify that on August 4, 2023, a true and correct copy of **Defendants’ Notice of Deposition of Gregory Mills** was served upon all counsel of record via e-mail, and filed this certificate of service with the Clerk of Court using the electronic filing system, which will send notification of such filing to all counsel of record.

Dated: August 4, 2023

/s/ Howard J. Fishman
 Wayne S. Karbal
 Howard J. Fishman
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*Attorneys for Defendant,
 First State Insurance Company*

**IN THE UNITED STATES DISTRICT COURT
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WOLVERINE WORLD WIDE, INC.,

Plaintiff,

v.

Case No. 1:19-cv-00010-JTN-SJB

THE AMERICAN INSURANCE COMPANY, et. al,

Honorable Janet T. Neff

Mag. Judge Sally J. Berens

Defendants.

Special Master Paula Manderfield

DEFENDANTS' NOTICE OF VIDEO DEPOSITION OF JOHN O'BRIEN

TO: All Counsel of Record

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Civil Procedure 26 and 30, Defendants¹ will take the deposition upon oral examination of John O'Brien before a notary public or other officer duly authorized to administer oaths, which deposition will be recorded by stenographic and video means. All parties are welcome to attend and ask questions.

The deposition will take place beginning at 9:30 AM Eastern (8:30 AM Central) on Wednesday, August 30, 2023, and continuing thereafter until completed, via web-based video conferencing software (Zoom or its equivalent). This deposition will be limited to the witness's knowledge of the events identified in Wolverine World Wide, Inc.'s response to Interrogatory Number 2 of Wolverine's Objections and Responses to Defendants' Third Set

¹ "Defendants" as used herein, collectively or separately, means Defendants First State Insurance Company, The North River Insurance Company, as well as Counter-Claimants The Travelers Indemnity Company of Illinois n/k/a Travelers Property Casualty Company of America, Northfield Insurance Company, St. Paul Fire and Marine Insurance Company, The Aetna Casualty and Surety Company n/k/a Travelers Casualty and Surety Company and Travelers Property Casualty Company of America.

of Phase II Interrogatories and Wolverine's April 26, 2023 Supplemental Phase II Initial Disclosure Statement. Defendants reserve the right to record the testimony by audio or video technology, including videotape and cloud-based technology. Please take notice that the court reporter may conduct the deposition from a remote location as if the reporter were physically present in the room with the deponent.

Respectfully submitted,

s/Patrick E. Winters

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Attorneys for Defendant/Counter-Claimant The Travelers Indemnity Company and Counter-Claimants The Travelers Indemnity Company of Illinois n/k/a Travelers Property Casualty Company of America, Northfield Insurance Company, St. Paul Fire and Marine Insurance Company, The Aetna Casualty and Surety Company n/k/a Travelers Casualty and Surety Company and Travelers Property Casualty Company of America

s/Anthony F. Caffrey, III

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s/Seth M. Jaffe

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Attorneys for Defendant North River Insurance Company

s/Howard J. Fishman

Wayne S. Karbal

Howard J. Fishman

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***Attorneys for Defendant First State
Insurance Company***

IN THE UNITED STATES DISTRICT COURT
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WOLVERINE WORLD WIDE, INC.,)	
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Plaintiff,)	
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v.)	Case No. 1:19-cv-00010-JTN-ESC
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)	Honorable Janet T. Neff
THE AMERICAN INSURANCE COMPANY,)	
et. al,)	Mag. Judge Ellen S. Carmody
)	Special Master Paula Manderfield
Defendants.)	

CERTIFICATE OF SERVICE

I, Howard J. Fishman, an attorney, certify that on August 4, 2023, a true and correct copy of **Defendants’ Notice of Deposition of John O’Brien** was served upon all counsel of record via e-mail, and filed this certificate of service with the Clerk of Court using the electronic filing system, which will send notification of such filing to all counsel of record.

Dated: August 4, 2023

/s/ Howard J. Fishman

Wayne S. Karbal

Howard J. Fishman

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Attorneys for Defendant,

First State Insurance Company

**IN THE UNITED STATES DISTRICT COURT
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WOLVERINE WORLD WIDE, INC.,

Plaintiff,

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Case No. 1:19-cv-00010-JTN-SJB

THE AMERICAN INSURANCE COMPANY, et. al,

Honorable Janet T. Neff

Mag. Judge Sally J. Berens

Defendants.

Special Master Paula Manderfield

DEFENDANTS' NOTICE OF VIDEO DEPOSITION OF ROBERT WINEGAR

TO: All Counsel of Record

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Civil Procedure 26 and 30, Defendants¹ will take the deposition upon oral examination of Robert Winegar before a notary public or other officer duly authorized to administer oaths, which deposition will be recorded by stenographic and video means. All parties are welcome to attend and ask questions.

The deposition will take place beginning at 1:00 PM Eastern (12:00 PM Central) on Monday, August 28, 2023, and continuing thereafter until completed, via web-based video conferencing software (Zoom or its equivalent). This deposition will be limited to the witness's knowledge of the events identified in Wolverine World Wide, Inc.'s response to

¹ "Defendants" as used herein, collectively or separately, means Defendants First State Insurance Company, The North River Insurance Company, and The Travelers Indemnity Company, as well as Counter-Claimants The Travelers Indemnity Company of Illinois n/k/a Travelers Property Casualty Company of America, Northfield Insurance Company, St. Paul Fire and Marine Insurance Company, The Aetna Casualty and Surety Company n/k/a Travelers Casualty and Surety Company and Travelers Property Casualty Company of America.

Interrogatory Number 2 of Wolverine's Objections and Responses to Defendants' Third Set of Phase II Interrogatories and Wolverine's April 26, 2023 Supplemental Phase II Initial Disclosure Statement. Defendants reserve the right to record the testimony by audio or video technology, including videotape and cloud-based technology. Please take notice that the court reporter may conduct the deposition from a remote location as if the reporter were physically present in the room with the deponent.

Respectfully submitted,

s/ Patrick E. Winters

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

WOLVERINE WORLD WIDE, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:19-cv-00010-JTN-ESC
)	
)	Honorable Janet T. Neff
THE AMERICAN INSURANCE COMPANY,)	
et. al,)	Mag. Judge Ellen S. Carmody
)	Special Master Paula Manderfield
Defendants.)	

CERTIFICATE OF SERVICE

I, Howard J. Fishman, an attorney, certify that on August 4, 2023, a true and correct copy of **Defendants’ Notice of Deposition of Robert Winegar** was served upon all counsel of record via e-mail, and filed this certificate of service with the Clerk of Court using the electronic filing system, which will send notification of such filing to all counsel of record.

Dated: August 4, 2023

/s/ Howard J. Fishman

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